42-045-00070

Monroe Energy, LLC
Trainer Refinery
4101 Post Road
Trainer, PA 19061
(610) 364-8000

July 18, 2019

VIA FEDEX 7757 6386 5743

JUL 19 2019

Mr. James Rebarchak
Regional Manager - Air Quality
Commonwealth of Pennsylvania
Pennsylvania Depart of Environmental Protection
2 East Main St.
Norristown, PA 19401

RE: MONROE ENERGY TRAINER REFINERY 2019 SEMI ANNUAL LDAR REPORTS, January 1, 2019 through June 30, 2019

Dear Mr. Rebarchak:

As required by Title 40, Part 60 Monroe Energy Trainer Refinery hereby submits the following Semi-Annual LDAR Reports for the time period January 1, 2019 to June 30, 2019

1. NSPS LDAR Report, per 40 CFR §60.480, Subpart VV/GGG:

   - Compliance Monitoring Summary
   - Compliance Repair Delay List
   - Repair Delayed History – Components Repaired During Reporting Period
   - Summary of Components Added and Deleted During Reporting Period

2. REFINERY MACT (RMACT HAP Units) LDAR Report, per 40 CFR, Part 63, Subpart CC:

   - Compliance Monitoring Summary
   - Compliance Repair Delay List
   - Repair Delayed History – Components Repaired During Reporting Period.
   - Summary of Components Added and Deleted During Reporting Period.

3. GGGa LDAR Report, per 40 CFR §60.590a, Subpart VVa/GGGa:

   - Compliance Monitoring Summary
   - Compliance Repair Delay List
   - Repair Delayed History – Components Repaired During Reporting Period.
   - Summary of Components Added and Deleted During Reporting Period.

As required by the Consent Decree H-05-0258, paragraph 236, Monroe Energy is hereby notifying you that the report leak rates contained herein for valves and pumps are the applicable regulatory leak definitions in Title 40 CFR, 60.482. In addition to the aforementioned Consent Decree, there were no valves with leak rates of over 10,000 ppm that required a Drill and Tap.

Should you have any questions or comments regarding this report, please contact Stephani Ski Szymanski, Environmental Engineer and Program Lead, at (610) 364-8073.

Sincerely,

Matthew Torell, PE
Environmental Leader

Enclosures (1)

Cc: Ms. Zelma Maldonado
Associate Director,
Office of Air Enforcement,
Compliance and Assistance
USEPA Region III
Air Protection Division
3AP20
1650 Arch Street
Philadelphia, Pa 19103-1129
VIA FEDEX 7757 6382 0049

Monroe Energy, LLC
4101 Post Road
Trainer, PA 19061
(610) 364-8000

Responsible Official Certification

Based upon information and belief formed after a reasonable inquiry, I, as a responsible official of the above-mentioned facility, certify the information contained in this report is accurate and true to the best of my knowledge.

Michael Capone,
Refinery Leader

MONROE ENERGY TRAINER REFINERY 2019 SEMI ANNUAL LDAR REPORTS, January 1, 2019 through June 30, 2019

Attachment 1: NSPS LDAR Report, per 40 CFR §60.480, Subpart VV/GGG

MONROE ENERGY TRAINER REFINERY

NSPS EPA VV/GGG LDAR SEMI ANNUAL REPORT

SUMMARY

REPORT DATE: JULY 9, 2019

REPORT PERIOD: JANUARY 1, 2019 TO JUNE 30, 2019

UNIT	CLASS	MONTH	MONITORED	LEAKDE	LATE REPAIR
543 CRUDE					
	PUMP	1	4	0	0
	PUMP	2	4	0	0
	PUMP	3	4	0	0
	PUMP	4	4	0	0
	PUMP	5	4	0	0
	PUMP	6	4	0	0
	VALVE	1	9	0	0
	VALVE	2	1,071	3	0
	VALVE	3	3	0	0
	VALVE	4	3	0	0
	VALVE	5	1,069	2	0
	VALVE	6	2	0	0
			2,181	**5**	**0**
544 CRUDE					
	PUMP	1	15	0	0
	PUMP	2	15	0	0
	PUMP	3	15	0	0
	PUMP	4	15	0	0
	PUMP	5	15	0	0
	PUMP	6	15	0	0
	VALVE	1	2	0	0
	VALVE	2	1,167	0	0
	VALVE	5	1,167	0	0
			2,426	**0**	**0**
544 VACUUM					
	PUMP	1	2	0	0
	PUMP	2	2	0	0
	PUMP	3	2	0	0
	PUMP	4	2	0	0
	PUMP	5	2	0	0
	PUMP	6	2	0	0
	VALVE	2	399	0	0
	VALVE	5	398	0	0
			809	**0**	**0**
ALKY					
	PUMP	1	26	0	0
	PUMP	2	27	0	0
	PUMP	3	27	0	0

	PUMP	4	27	0	0
	PUMP	5	27	0	0
	PUMP	6	27	0	0
	VALVE	1	1,485	3	0
	VALVE	2	3,280	8	0
	VALVE	3	64	0	0
	VALVE	4	10	0	0
	VALVE	5	3,303	6	0
	VALVE	6	9	1	0
			8,312	**18**	**0**
AMINE					
	PUMP	1	2	0	0
	PUMP	2	2	0	0
	PUMP	3	2	0	0
	PUMP	4	2	0	0
	PUMP	5	2	0	0
	PUMP	6	2	0	0
	VALVE	1	360	1	0
	VALVE	2	3	0	0
	VALVE	3	1	0	0
	VALVE	4	361	0	0
	VALVE	5	4	0	0
			741	**1**	**0**
AWWTP					
	VALVE	1	140	0	0
	VALVE	4	140	0	0
			280	**0**	**0**
BLEND					
	PUMP	1	18	0	0
	PUMP	2	18	0	0
	PUMP	3	18	0	0
	PUMP	4	18	0	0
	PUMP	5	17	0	0
	PUMP	6	18	0	0
	VALVE	1	1,435	4	0
	VALVE	2	4	0	0
	VALVE	3	4	0	0
	VALVE	4	1,432	3	0
	VALVE	5	5	0	0
	VALVE	6	3	0	0
			2,990	**7**	**0**
BOILER 14					
	VALVE	1	1	0	0
	VALVE	2	49	0	0
	VALVE	3	49	0	0
	VALVE	5	49	0	0

	VALVE	6	49	0	0
			197	**0**	**0**
BOILERS 9 & 10					
	VALVE	2	440	0	0
	VALVE	3	439	1	0
	VALVE	4	1	0	0
	VALVE	5	439	1	0
	VALVE	6	439	0	0
			1,758	**2**	**0**
BUTANE					
	VALVE	1	3	0	0
	VALVE	2	301	0	0
	VALVE	5	304	0	0
			608	**0**	**0**
DESALT					
	PUMP	1	10	0	0
	PUMP	2	10	0	0
	PUMP	3	10	0	0
	PUMP	4	10	0	0
	PUMP	5	10	0	0
	PUMP	6	10	0	0
	VALVE	1	813	2	0
	VALVE	2	2	0	0
	VALVE	3	2	0	0
	VALVE	4	811	0	0
			1,688	**2**	**0**
DIESEL					
	PUMP	1	11	0	0
	PUMP	2	11	0	0
	PUMP	3	11	0	0
	PUMP	4	11	0	0
	PUMP	5	11	0	0
	PUMP	6	11	0	0
	VALVE	1	778	3	0
	VALVE	2	3	0	0
	VALVE	3	3	0	0
	VALVE	4	778	1	0
	VALVE	5	1	0	0
	VALVE	6	1	0	0
			1,630	**4**	**0**
FCC					
	PUMP	1	25	0	0
	PUMP	2	25	0	0
	PUMP	3	25	1	0

	PUMP	4	25	0	0
	PUMP	5	24	0	0
	PUMP	6	25	0	0
	VALVE	1	79	0	0
	VALVE	2	2,203	2	0
	VALVE	3	6	0	0
	VALVE	4	2	0	0
	VALVE	5	2,274	5	0
	VALVE	6	6	0	0
			4,719	**8**	**0**

FLARE

	PUMP	1	3	0	0
	PUMP	2	3	0	0
	PUMP	3	3	0	0
	PUMP	4	3	0	0
	PUMP	5	3	0	0
	PUMP	6	3	0	0
	VALVE	3	221	0	0
	VALVE	6	222	0	0
			461	**0**	**0**

FLARE GAS RECOVERY

	PUMP	1	7	0	0
	PUMP	2	7	0	0
	PUMP	3	7	0	0
	PUMP	4	7	0	0
	PUMP	5	7	0	0
	PUMP	6	7	0	0
	VALVE	3	1,048	0	0
	VALVE	6	1,047	0	0
			2,137	**0**	**0**

ISOCRK

	PUMP	1	17	0	0
	PUMP	2	18	0	0
	PUMP	3	18	0	0
	PUMP	4	18	0	0
	PUMP	5	18	0	0
	PUMP	6	18	0	0
	VALVE	1	3,132	7	0
	VALVE	2	21	0	0
	VALVE	3	7	0	0
	VALVE	4	3,129	5	0
	VALVE	5	5	0	0
	VALVE	6	5	0	0
			6,406	**12**	**0**

KERO

	PUMP	1	9	0	0

	PUMP	2	9	0	0
	PUMP	3	9	0	0
	PUMP	4	9	0	0
	PUMP	5	9	0	0
	PUMP	6	9	0	0
	VALVE	1	1,525	3	0
	VALVE	2	6	0	0
	VALVE	3	3	0	0
	VALVE	4	1,525	2	0
	VALVE	5	2	0	0
	VALVE	6	2	0	0
			3,117	**5**	**0**
LOWLN					
	PUMP	1	6	0	0
	PUMP	2	6	0	0
	PUMP	3	6	0	0
	PUMP	4	6	0	0
	PUMP	5	6	0	0
	PUMP	6	6	0	0
	VALVE	1	574	2	0
	VALVE	2	2	0	0
	VALVE	3	2	0	0
	VALVE	4	584	1	0
	VALVE	5	11	1	0
	VALVE	6	1	0	0
			1,210	**4**	**0**
MARINE					
	PUMP	1	2	0	0
	PUMP	2	2	0	0
	PUMP	3	2	0	0
	PUMP	4	2	0	0
	PUMP	5	2	0	0
	PUMP	6	2	0	0
	VALVE	1	2	0	0
	VALVE	2	288	0	0
	VALVE	5	290	0	0
			592	**0**	**0**
NAPHTH					
	PUMP	1	16	0	0
	PUMP	2	16	0	0
	PUMP	3	16	0	0
	PUMP	4	16	0	0
	PUMP	5	16	0	0
	PUMP	6	16	1	0
	VALVE	1	7	0	0
	VALVE	2	4	0	0
	VALVE	3	1,505	3	0

	VALVE	4	6	0	0
	VALVE	5	6	0	0
	VALVE	6	1,515	3	0
			3,139	**7**	**0**
PLATFO					
	PUMP	1	8	0	0
	PUMP	2	8	0	0
	PUMP	3	8	0	0
	PUMP	4	8	0	0
	PUMP	5	8	0	0
	PUMP	6	8	0	0
	VALVE	1	12	0	0
	VALVE	2	6	0	0
	VALVE	3	2,151	3	0
	VALVE	4	3	0	0
	VALVE	5	3	0	0
	VALVE	6	2,161	5	0
			4,384	**8**	**0**
PRORCL					
	PUMP	1	1	0	0
	PUMP	2	1	0	0
	PUMP	3	1	0	0
	PUMP	4	1	0	0
	PUMP	5	1	0	0
	PUMP	6	1	0	0
	VALVE	3	332	2	0
	VALVE	4	2	0	0
	VALVE	5	2	0	0
	VALVE	6	330	4	0
			672	**6**	**0**
PROREC					
	PUMP	1	2	0	0
	PUMP	2	2	0	0
	PUMP	3	2	0	0
	PUMP	4	2	0	0
	PUMP	5	2	0	0
	PUMP	6	2	0	0
	VALVE	2	646	3	0
	VALVE	3	3	0	0
	VALVE	4	3	0	0
	VALVE	5	638	6	0
	VALVE	6	8	0	0
			1,310	**9**	**0**
PROSTO					
	PUMP	1	3	0	0
	PUMP	2	3	0	0

	PUMP	3	3	0	0
	PUMP	4	4	0	0
	PUMP	5	4	0	0
	PUMP	6	4	0	0
	VALVE	1	530	2	0
	VALVE	2	2	0	0
	VALVE	3	3	0	0
	VALVE	4	530	1	0
	VALVE	5	1	0	0
	VALVE	6	2	0	0
			1,089	**3**	**0**
REFORM					
	PUMP	1	8	0	0
	PUMP	2	8	0	0
	PUMP	3	8	0	0
	PUMP	4	8	0	0
	PUMP	5	8	0	0
	PUMP	6	8	0	0
	VALVE	2	825	2	0
	VALVE	3	18	0	0
	VALVE	4	2	0	0
	VALVE	5	823	1	0
	VALVE	6	15	0	0
			1,731	**3**	**0**
SOUR					
	VALVE	2	53	0	0
	VALVE	5	53	0	0
			106	**0**	**0**
SOUTH TANK FARM					
	PUMP	1	25	0	0
	PUMP	2	24	0	0
	PUMP	3	24	0	0
	PUMP	4	25	0	0
	PUMP	5	25	0	0
	PUMP	6	24	0	0
	VALVE	1	1	0	0
	VALVE	2	1	0	0
	VALVE	3	2,639	3	0
	VALVE	4	15	0	0
	VALVE	5	13	0	0
	VALVE	6	2,641	2	0
			5,457	**5**	**0**
SRU					
	VALVE	1	77	0	0
	VALVE	4	76	0	0

			153	**0**	**0**
TAIL GAS					
	VALVE	1	162	0	0
	VALVE	2	2	0	0
	VALVE	4	162	1	0
	VALVE	5	1	0	0
	VALVE	6	1	0	0
			328	**1**	**0**
TF					
	PUMP	1	10	0	0
	PUMP	2	10	0	0
	PUMP	3	10	1	0
	PUMP	4	10	0	0
	PUMP	5	10	0	0
	PUMP	6	10	0	0
	VALVE	3	896	0	0
	VALVE	6	896	1	0
			1,852	**2**	**0**
ULSG					
	PUMP	1	8	0	0
	PUMP	2	8	0	0
	PUMP	3	8	0	0
	PUMP	4	8	0	0
	PUMP	5	8	0	0
	PUMP	6	8	0	0
	VALVE	1	3	0	0
	VALVE	2	3	0	0
	VALVE	3	2,153	5	0
	VALVE	4	6	0	0
	VALVE	5	5	0	0
	VALVE	6	2,152	5	0
			4,370	**10**	**0**
VACUUM					
	PUMP	1	2	0	0
	PUMP	2	2	0	0
	PUMP	3	2	0	0
	PUMP	4	2	0	0
	PUMP	5	2	0	0
	PUMP	6	2	0	0
	VALVE	1	496	3	0
	VALVE	2	5	0	0
	VALVE	3	3	0	0
	VALVE	4	496	1	0
	VALVE	5	1	0	0
	VALVE	6	1	0	0
			1,014	**4**	**0**

VGO

PUMP	1	1	0	0
PUMP	2	1	0	0
PUMP	3	1	0	0
PUMP	4	1	0	0
PUMP	5	1	0	0
PUMP	6	1	0	0
VALVE	1	625	2	0
VALVE	2	3	0	0
VALVE	3	2	0	0
VALVE	4	622	3	0
VALVE	5	4	0	0
VALVE	6	3	0	0
		1,265	**5**	**0**
	TOTAL:	**69,132**	**131**	**0**

MONROE ENERGY TRAINER REFINERY
PLACED ON DELAY OF REPAIR
EPA VV/GGG REPORT
REPORT DATE: JULY 9, 2019
REPORT COMPLIANCE PERIOD: JANUARY 1, 2019 TO JUNE 30, 2019

UNIT	TAG	CLASS	PLACED ON DELAY
NO COMPONENTS WERE PLACED ON DELAY OF REPAIR FOR THE REPORTING PERIOD			
			0

MONROE ENERGY TRAINER REFINERY
REMOVED FROM DELAY
EPA VV/GGG REPORT
REPORT DATE: JULY 9, 2019
REPORT COMPLIANCE PERIOD: JANUARY 1, 2019 TO JUNE 30, 2019

UNIT	TAG	CLASS	PLACED ON DELAY	REMOVED FROM DELAY
NO COMPONENTS ARE ON DELAY OF REPAIR				
			TOTAL:	0

MONROE ENERGY TRAINER REFINERY
ADDED AND DELETED
EPA VV/GGG REPORT
REPORT DATE: JANUARY 21, 2019
REPORT COMPLIANCE PERIOD: JULY 1, 2018 THROUGH DECEMBER, 2018

UNIT	CLASS	ADDED	DELETED
543 CRUDE	PUMP	0	0
543 CRUDE	VALVE	0	6
544 CRUDE	PUMP	0	0
544 CRUDE	VALVE	0	6
544 VACUUM	PUMP	0	0
544 VACUUM	VALVE	0	4
ALKY	PUMP	0	0
ALKY	VALVE	14	2
AMINE	PUMP	0	0
AMINE	VALVE	6	0
AWWTP	VALVE	0	0
BLEND	PUMP	0	0
BLEND	VALVE	3	0
BOILER	VALVE	0	78
BOILER 14	VALVE	0	0
BOILERS 9 & 10	VALVE	0	0
BUTANE	VALVE	0	0
CRUDE	PUMP	0	0
CRUDE	VALVE	0	0
DESALT	PUMP	0	0
DESALT	VALVE	0	0
DIESEL	PUMP	0	0
DIESEL	VALVE	0	0
FCC	PUMP	0	0
FCC	VALVE	7	0
FLARE	PUMP	0	0
FLARE	VALVE	1	0
FLARE GAS RECOVERY	PUMP	0	0
FLARE GAS RECOVERY	VALVE	0	0
ISOCRK	PUMP	0	0
ISOCRK	VALVE	0	0
KERO	PUMP	0	0
KERO	VALVE	1	0
LOWLN	PUMP	0	0
LOWLN	VALVE	10	0
MARINE	PUMP	0	0
MARINE	VALVE	0	0
NAPHTH	PUMP	0	0
NAPHTH	VALVE	35	26
OYF	VALVE	0	0
PLATFO	PUMP	0	0
PLATFO	VALVE	1	0
PRORCL	PUMP	0	0
PRORCL	VALVE	0	0
PROREC	PUMP	0	0
PROREC	VALVE	2	0
PROSTO	PUMP	0	0

PROSTO	VALVE	0	0
REFORM	PUMP	0	0
REFORM	VALVE	2	0
SOUR	PUMP	0	0
SOUR	VALVE	0	0
SOUTH TANK FARM	PUMP	0	0
SOUTH TANK FARM	VALVE	12	8
SRU	VALVE	0	0
SUNOL	PUMP	0	0
SUNOL	VALVE	0	0
TAIL GAS	VALVE	0	0
TF	PUMP	0	0
TF	VALVE	0	8
ULSG	PUMP	0	0
ULSG	VALVE	0	0
VACUUM	PUMP	0	0
VACUUM	VALVE	0	0
VGO	PUMP	0	0
VGO	VALVE	2	5
	TOTAL:	96	143

Attachment 2: REFINERY MACT (RMACT HAP Units) LDAR Report, per 40 CFR, Part 63, Subpart CC

MONROE ENERGY TRAINER REFINERY

EPA MACT CC LDAR UNIT SUMMARY

REPORT DATE: JULY 9, 2019

REPORT PERIOD: JANUARY 1, 2019 TO JUNE 30, 2019

MACT CC UNITS

UNIT	CLASS	MONTH	MONITORED	LEAKDED	LATE REPAIR
543 CRUDE					
	PUMP	1	4	0	0
	PUMP	2	4	0	0
	PUMP	3	4	0	0
	PUMP	4	4	0	0
	PUMP	5	4	0	0
	PUMP	6	4	0	0
	VALVE	1	9	0	0
	VALVE	2	1,071	3	0
	VALVE	3	3	0	0
	VALVE	4	3	0	0
	VALVE	5	1,069	2	0
	VALVE	6	2	0	0
			2,181	**5**	**0**
544 CRUDE					
	PUMP	1	15	0	0
	PUMP	2	15	0	0
	PUMP	3	15	0	0
	PUMP	4	15	0	0
	PUMP	5	15	0	0
	PUMP	6	15	0	0
	VALVE	1	2	0	0
	VALVE	2	1,167	0	0
	VALVE	5	1,167	0	0
			2,426	**0**	**0**
544 VACUUM					
	PUMP	1	2	0	0
	PUMP	2	2	0	0
	PUMP	3	2	0	0
	PUMP	4	2	0	0
	PUMP	5	2	0	0
	PUMP	6	2	0	0
	VALVE	2	399	0	0
	VALVE	5	398	0	0
			809	**0**	**0**
ALKY					
	PUMP	1	26	0	0

	PUMP	2	27	0	0
	PUMP	3	27	0	0
	PUMP	4	27	0	0
	PUMP	5	27	0	0
	PUMP	6	27	0	0
	VALVE	1	1,485	3	0
	VALVE	2	3,280	8	0
	VALVE	3	64	0	0
	VALVE	4	10	0	0
	VALVE	5	3,303	6	0
	VALVE	6	9	1	0
			8,312	**18**	**0**
AMINE					
	PUMP	1	2	0	0
	PUMP	2	2	0	0
	PUMP	3	2	0	0
	PUMP	4	2	0	0
	PUMP	5	2	0	0
	PUMP	6	2	0	0
	VALVE	1	360	1	0
	VALVE	2	3	0	0
	VALVE	3	1	0	0
	VALVE	4	361	0	0
	VALVE	5	4	0	0
			741	**1**	**0**
AWWTP					
	VALVE	1	140	0	0
	VALVE	4	140	0	0
			280	**0**	**0**
BLEND					
	PUMP	1	18	0	0
	PUMP	2	18	0	0
	PUMP	3	18	0	0
	PUMP	4	18	0	0
	PUMP	5	17	0	0
	PUMP	6	18	0	0
	VALVE	1	1,435	4	0
	VALVE	2	4	0	0
	VALVE	3	4	0	0
	VALVE	4	1,432	3	0
	VALVE	5	5	0	0
	VALVE	6	3	0	0
			2,990	**7**	**0**

BOILER 14

	VALVE	1	1	0	0
	VALVE	2	49	0	0
	VALVE	3	49	0	0
	VALVE	5	49	0	0
	VALVE	6	49	0	0
			197	**0**	**0**

BOILERS 9 & 10

	VALVE	2	440	0	0
	VALVE	3	439	1	0
	VALVE	4	1	0	0
	VALVE	5	439	1	0
	VALVE	6	439	0	0
			1,758	**2**	**0**

BUTANE

	VALVE	1	3	0	0
	VALVE	2	301	0	0
	VALVE	5	304	0	0
			608	**0**	**0**

DESALT

	PUMP	1	10	0	0
	PUMP	2	10	0	0
	PUMP	3	10	0	0
	PUMP	4	10	0	0
	PUMP	5	10	0	0
	PUMP	6	10	0	0
	VALVE	1	813	2	0
	VALVE	2	2	0	0
	VALVE	3	2	0	0
	VALVE	4	811	0	0
			1,688	**2**	**0**

DIESEL

	PUMP	1	11	0	0
	PUMP	2	11	0	0
	PUMP	3	11	0	0
	PUMP	4	11	0	0
	PUMP	5	11	0	0
	PUMP	6	11	0	0
	VALVE	1	778	3	0
	VALVE	2	3	0	0
	VALVE	3	3	0	0
	VALVE	4	778	1	0
	VALVE	5	1	0	0

	VALVE	6	1	0	0
			1,630	**4**	**0**
FCC					
	PUMP	1	25	0	0
	PUMP	2	25	0	0
	PUMP	3	25	1	0
	PUMP	4	25	0	0
	PUMP	5	24	0	0
	PUMP	6	25	0	0
	VALVE	1	79	0	0
	VALVE	2	2,203	2	0
	VALVE	3	6	0	0
	VALVE	4	2	0	0
	VALVE	5	2,274	5	0
	VALVE	6	6	0	0
			4,719	**8**	**0**
FLARE					
	PUMP	1	3	0	0
	PUMP	2	3	0	0
	PUMP	3	3	0	0
	PUMP	4	3	0	0
	PUMP	5	3	0	0
	PUMP	6	3	0	0
	VALVE	3	221	0	0
	VALVE	6	222	0	0
			461	**0**	**0**
FLARE GAS RECOVERY					
	PUMP	1	7	0	0
	PUMP	2	7	0	0
	PUMP	3	7	0	0
	PUMP	4	7	0	0
	PUMP	5	7	0	0
	PUMP	6	7	0	0
	VALVE	3	1,048	0	0
	VALVE	6	1,047	0	0
			2,137	**0**	**0**
ISOCRK					
	PUMP	1	17	0	0
	PUMP	2	18	0	0
	PUMP	3	18	0	0
	PUMP	4	18	0	0
	PUMP	5	18	0	0
	PUMP	6	18	0	0

	VALVE	1	3,132	7	0
	VALVE	2	21	0	0
	VALVE	3	7	0	0
	VALVE	4	3,129	5	0
	VALVE	5	5	0	0
	VALVE	6	5	0	0
			6,406	**12**	**0**
KERO\HCN					
	PUMP	1	9	0	0
	PUMP	2	9	0	0
	PUMP	3	9	0	0
	PUMP	4	9	0	0
	PUMP	5	9	0	0
	PUMP	6	9	0	0
	VALVE	1	1,525	3	0
	VALVE	2	6	0	0
	VALVE	3	3	0	0
	VALVE	4	1,525	2	0
	VALVE	5	2	0	0
	VALVE	6	2	0	0
			3,117	**5**	**0**
LOWLN					
	PUMP	1	6	0	0
	PUMP	2	6	0	0
	PUMP	3	6	0	0
	PUMP	4	6	0	0
	PUMP	5	6	0	0
	PUMP	6	6	0	0
	VALVE	1	574	2	0
	VALVE	2	2	0	0
	VALVE	3	2	0	0
	VALVE	4	584	1	0
	VALVE	5	11	1	0
	VALVE	6	1	0	0
			1,210	**4**	**0**
MARINE					
	PUMP	1	2	0	0
	PUMP	2	2	0	0
	PUMP	3	2	0	0
	PUMP	4	2	0	0
	PUMP	5	2	0	0
	PUMP	6	2	0	0
	VALVE	1	2	0	0
	VALVE	2	288	0	0

	VALVE	5	290	0	0
			592	**0**	**0**
NAPHTH					
	PUMP	1	16	0	0
	PUMP	2	16	0	0
	PUMP	3	16	0	0
	PUMP	4	16	0	0
	PUMP	5	16	0	0
	PUMP	6	16	1	0
	VALVE	1	7	0	0
	VALVE	2	4	0	0
	VALVE	3	1,505	3	0
	VALVE	4	6	0	0
	VALVE	5	6	0	0
	VALVE	6	1,515	3	0
			3,139	**7**	**0**
PLATFO					
	PUMP	1	8	0	0
	PUMP	2	8	0	0
	PUMP	3	8	0	0
	PUMP	4	8	0	0
	PUMP	5	8	0	0
	PUMP	6	8	0	0
	VALVE	1	12	0	0
	VALVE	2	6	0	0
	VALVE	3	2,151	3	0
	VALVE	4	3	0	0
	VALVE	5	3	0	0
	VALVE	6	2,161	5	0
			4,384	**8**	**0**
PRORCL					
	PUMP	1	1	0	0
	PUMP	2	1	0	0
	PUMP	3	1	0	0
	PUMP	4	1	0	0
	PUMP	5	1	0	0
	PUMP	6	1	0	0
	VALVE	3	332	2	0
	VALVE	4	2	0	0
	VALVE	5	2	0	0
	VALVE	6	330	4	0
			672	**6**	**0**
PROREC					

	PUMP	1	2	0	0
	PUMP	2	2	0	0
	PUMP	3	2	0	0
	PUMP	4	2	0	0
	PUMP	5	2	0	0
	PUMP	6	2	0	0
	VALVE	2	646	3	0
	VALVE	3	3	0	0
	VALVE	4	3	0	0
	VALVE	5	638	6	0
	VALVE	6	8	0	0
			1,310	**9**	**0**

PROSTO

	PUMP	1	3	0	0
	PUMP	2	3	0	0
	PUMP	3	3	0	0
	PUMP	4	4	0	0
	PUMP	5	4	0	0
	PUMP	6	4	0	0
	VALVE	1	530	2	0
	VALVE	2	2	0	0
	VALVE	3	3	0	0
	VALVE	4	530	1	0
	VALVE	5	1	0	0
	VALVE	6	2	0	0
			1,089	**3**	**0**

REFORM

	PUMP	1	8	0	0
	PUMP	2	8	0	0
	PUMP	3	8	0	0
	PUMP	4	8	0	0
	PUMP	5	8	0	0
	PUMP	6	8	0	0
	VALVE	2	825	2	0
	VALVE	3	18	0	0
	VALVE	4	2	0	0
	VALVE	5	823	1	0
	VALVE	6	15	0	0
			1,731	**3**	**0**

SOUR

	VALVE	2	53	0	0
	VALVE	5	53	0	0
			106	**0**	**0**

SOUTH TANK FARM

	PUMP	1	25	0	0
	PUMP	2	24	0	0
	PUMP	3	24	0	0
	PUMP	4	25	0	0
	PUMP	5	25	0	0
	PUMP	6	24	0	0
	VALVE	1	1	0	0
	VALVE	2	1	0	0
	VALVE	3	2,639	3	0
	VALVE	4	15	0	0
	VALVE	5	13	0	0
	VALVE	6	2,641	2	0
			5,457	**5**	**0**

SRU

	VALVE	1	77	0	0
	VALVE	4	76	0	0
			153	**0**	**0**

TAIL GAS

	VALVE	1	162	0	0
	VALVE	2	2	0	0
	VALVE	4	162	1	0
	VALVE	5	1	0	0
	VALVE	6	1	0	0
			328	**1**	**0**

TF

	PUMP	1	10	0	0
	PUMP	2	10	0	0
	PUMP	3	10	1	0
	PUMP	4	10	0	0
	PUMP	5	10	0	0
	PUMP	6	10	0	0
	VALVE	3	896	0	0
	VALVE	6	896	1	0
			1,852	**2**	**0**

ULSG

	PUMP	1	8	0	0
	PUMP	2	8	0	0
	PUMP	3	8	0	0
	PUMP	4	8	0	0
	PUMP	5	8	0	0
	PUMP	6	8	0	0
	VALVE	1	3	0	0

	VALVE	2	3	0	0
	VALVE	3	2,153	5	0
	VALVE	4	6	0	0
	VALVE	5	5	0	0
	VALVE	6	2,152	5	0
			4,370	**10**	**0**
VACUUM					
	PUMP	1	2	0	0
	PUMP	2	2	0	0
	PUMP	3	2	0	0
	PUMP	4	2	0	0
	PUMP	5	2	0	0
	PUMP	6	2	0	0
	VALVE	1	496	3	0
	VALVE	2	5	0	0
	VALVE	3	3	0	0
	VALVE	4	496	1	0
	VALVE	5	1	0	0
	VALVE	6	1	0	0
			1,014	**4**	**0**
VGO					
	PUMP	1	1	0	0
	PUMP	2	1	0	0
	PUMP	3	1	0	0
	PUMP	4	1	0	0
	PUMP	5	1	0	0
	PUMP	6	1	0	0
	VALVE	1	625	2	0
	VALVE	2	3	0	0
	VALVE	3	2	0	0
	VALVE	4	622	3	0
	VALVE	5	4	0	0
	VALVE	6	3	0	0
			1,265	**5**	**0**
		TOTAL:	**69,132**	**131**	**0**

MONROE ENERGY TRAINER REFINERY
PLACED ON DELAY OF REPAIR
EPA VV/GGG REPORT
REPORT DATE: JULY 9, 2019
REPORT COMPLIANCE PERIOD: JANUARY 1, 2019 TO JUNE 30, 2019

NO COMPONENTS ARE ON DELAY OF REPAIR

MONROE ENERGY TRAINER REFINERY
REMOVED FROM DELAY
EPA VV/GGG REPORT
REPORT DATE: JULY 9, 2019
REPORT COMPLIANCE PERIOD: JANUARY 1, 2019 TO JUNE 30, 2019

NO COMPONENTS ARE ON DELAY OF REPAIR	

MONROE ENERGY TRAINER REFINERY
ADDED AND DELETED
EPA VV/GGG REPORT
REPORT DATE: JULY 9, 2019
REPORT COMPLIANCE PERIOD: JANUARY 1, 2019 TO JUNE 30, 2019

MACT CC UNITS

UNIT	CLASS	ADDED	DELETED
543 CRUDE	PUMP	0	0
543 CRUDE	VALVE	0	6
544 CRUDE	PUMP	0	0
544 CRUDE	VALVE	0	6
544 VACUUM	PUMP	0	0
544 VACUUM	VALVE	0	4
ALKY	PUMP	0	0
ALKY	VALVE	14	2
AMINE	PUMP	0	0
AMINE	VALVE	6	0
AWWTP	VALVE	0	0
BLEND	PUMP	0	0
BLEND	VALVE	3	0
BOILER	VALVE	0	78
BOILER 14	VALVE	0	0
BOILERS 9 & 10	VALVE	0	0
BUTANE	VALVE	0	0
CRUDE	PUMP	0	0
CRUDE	VALVE	0	0
DESALT	PUMP	0	0
DESALT	VALVE	0	0
DIESEL	PUMP	0	0
DIESEL	VALVE	0	0
FCC	PUMP	0	0
FCC	VALVE	7	0
FLARE	PUMP	0	0
FLARE	VALVE	1	0
FLARE GAS RECOVERY	PUMP	0	0
FLARE GAS RECOVERY	VALVE	0	0
ISOCRK	PUMP	0	0
ISOCRK	VALVE	0	0
KERO/HCN	PUMP	0	0
KERO/HCN	VALVE	1	0
LOWLN	PUMP	0	0
LOWLN	VALVE	10	0
MARINE	PUMP	0	0
MARINE	VALVE	0	0
NAPHTH	PUMP	0	0
NAPHTH	VALVE	35	26
OYF	VALVE	0	0
PLATFO	PUMP	0	0
PLATFO	VALVE	1	0
PRORCL	PUMP	0	0
PRORCL	VALVE	0	0
PROREC	PUMP	0	0
PROREC	VALVE	2	0
PROSTO	PUMP	0	0
PROSTO	VALVE	0	0

REFORM	PUMP	0	0
REFORM	VALVE	2	0
SOUR	PUMP	0	0
SOUR	VALVE	0	0
SOUTH TANK FARM	PUMP	0	0
SOUTH TANK FARM	VALVE	12	8
SRU	VALVE	0	0
TAIL GAS	VALVE	0	0
TF	PUMP	0	0
TF	VALVE	0	8
ULSG	PUMP	0	0
ULSG	VALVE	0	0
VACUUM	PUMP	0	0
VACUUM	VALVE	0	0
VGO	PUMP	0	0
VGO	VALVE	2	5
	TOTAL:	96	143

Attachment 3: GGGa LDAR Report, per 40 CFR §60.590a, Subpart VVa/GGGa

MONROE ENERGY TRAINER REPORT
GGGa SEMI ANNUAL LDAR REPORT
SUMMARY
REPORT DATE: JULY 9, 2019
REPORT PERIOD: JANUARY 1, 2019 TO JUNE 30, 2019

UNIT	CLASS	MONTH	MONITORED	LEAKED	LATE REPAIR
543 CRUDE					
	PUMP	1	4	0	0
	PUMP	2	4	0	0
	PUMP	3	4	0	0
	PUMP	4	4	0	0
	PUMP	5	4	0	0
	PUMP	6	4	0	0
	RELIEF	2	8	0	0
	RELIEF	5	8	0	0
	VALVE	1	9	0	0
	VALVE	2	1,071	3	0
	VALVE	3	3	0	0
	VALVE	4	3	0	0
	VALVE	5	1,069	2	0
	VALVE	6	2	0	0
			2,197	**5**	**0**
544 CRUDE					
	PUMP	1	15	0	0
	PUMP	2	15	0	0
	PUMP	3	15	0	0
	PUMP	4	15	0	0
	PUMP	5	15	0	0
	PUMP	6	15	0	0
	RELIEF	2	8	0	0
	RELIEF	5	8	0	0
	VALVE	1	2	0	0
	VALVE	2	1,167	0	0
	VALVE	5	1,167	0	0
			2,442	**0**	**0**
544 VACUUM					
	PUMP	1	2	0	0
	PUMP	2	2	0	0
	PUMP	3	2	0	0
	PUMP	4	2	0	0
	PUMP	5	2	0	0
	PUMP	6	2	0	0
	RELIEF	2	7	0	0
	RELIEF	5	7	0	0
	VALVE	2	399	0	0
	VALVE	5	398	0	0

			823	**0**	**0**
BOILER 14					
	VALVE	1	1	0	0
	VALVE	2	49	0	0
	VALVE	3	49	0	0
	VALVE	5	49	0	0
	VALVE	6	49	0	0
			197	**0**	**0**
BOILERS 9 & 10					
	RELIEF	2	4	0	0
	RELIEF	5	4	0	0
	VALVE	2	440	0	0
	VALVE	3	439	1	0
	VALVE	4	1	0	0
	VALVE	5	439	1	0
	VALVE	6	439	0	0
			1,766	**2**	**0**
FLARE GAS RECOVERY					
	PUMP	1	7	0	0
	PUMP	2	7	0	0
	PUMP	3	7	0	0
	PUMP	4	7	0	0
	PUMP	5	7	0	0
	PUMP	6	7	0	0
	RELIEF	3	20	0	0
	RELIEF	6	20	0	0
	VALVE	3	1,048	0	0
	VALVE	6	1,047	0	0
			2,177	**0**	**0**
ULSG					
	PUMP	1	8	0	0
	PUMP	2	8	0	0
	PUMP	3	8	0	0
	PUMP	4	8	0	0
	PUMP	5	8	0	0
	PUMP	6	8	0	0
	RELIEF	3	17	0	0
	RELIEF	6	17	0	0
	VALVE	1	3	0	0
	VALVE	2	3	0	0
	VALVE	3	2,153	5	0
	VALVE	4	6	0	0
	VALVE	5	5	0	0
	VALVE	6	2,152	5	0
			4,404	**10**	**0**

VGO

PUMP	1	1	0	0
PUMP	2	1	0	0
PUMP	3	1	0	0
PUMP	4	1	0	0
PUMP	5	1	0	0
PUMP	6	1	0	0
RELIEF	1	11	0	0
RELIEF	4	13	0	0
RELIEF	5	2	0	0
RELIEF	6	2	0	0
VALVE	1	624	2	0
VALVE	2	3	0	0
VALVE	3	2	0	0
VALVE	4	621	3	0
VALVE	5	4	0	0
VALVE	6	3	0	0
		1,291	**5**	**0**
	TOTAL:	**15,297**	**22**	**0**

MONROE ENERGY TRAINER REPORT
GGGa SEMI ANNUAL LDAR REPORT
COMPONENTS ON DELAY OF REPAIR
REPORT DATE: JULY 9, 2019
REPORT PERIOD: JANUARY 1, 2019 TO JUNE 30, 2019

TAG	UNIT	CLASS	DATE PLACED ON DELAY
NO GGGa COMPONENTS PLACED ON DOR FOR REPORTING PERIOD			
		TOTAL:	0

MONROE ENERGY TRAINER REPORT
GGGa SEMI ANNUAL LDAR REPORT
COMPONENTS REMOVED FROM DELAY OF REPAIR
REPORT DATE: JULY 9, 2019
REPORT PERIOD: JANUARY 1, 2019 TO JUNE 30, 2019

TAG	UNIT	CLASS	DATE PLACED ON DELAY
NO GGGa COMPONENTS REMOVED FROM DOR FOR REPORTING PERIOD			
		TOTAL:	0

MONROE ENERGY TRAINER REPORT
GGGa SEMI ANNUAL LDAR REPORT
COMPONENTS ADDED AND DELETED
REPORT DATE: JULY 9, 2019
REPORT PERIOD: JANUARY 1, 2019 TO JUNE 30, 2019

UNIT	CLASS	ADDED	DELETED
543 CRUDE	CONNECTOR	0	0
543 CRUDE	PRESSURE RELIEF DEVICE	0	0
543 CRUDE	PUMP	0	0
543 CRUDE	VALVE	0	6
544 CRUDE	PRESSURE RELIEF DEVICE	0	0
544 CRUDE	PUMP	0	0
544 CRUDE	VALVE	0	6
544 VACUUM	PRESSURE RELIEF DEVICE	0	0
544 VACUUM	PUMP	0	0
544 VACUUM	VALVE	0	4
BOILER 14	VALVE	0	0
BOILERS 9 & 10	CONNECTOR	0	0
BOILERS 9 & 10	PRESSURE RELIEF DEVICE	0	0
BOILERS 9 & 10	VALVE	0	0
FLARE GAS RECOVERY	COMPRESSOR	0	0
FLARE GAS RECOVERY	PRESSURE RELIEF DEVICE	0	0
FLARE GAS RECOVERY	PUMP	0	0
FLARE GAS RECOVERY	VALVE	0	0
ULSG	COMPRESSOR	0	0
ULSG	PRESSURE RELIEF DEVICE	0	0
ULSG	PUMP	0	0
ULSG	VALVE	0	0
VGO	COMPRESSOR	0	0
VGO	CONNECTOR	0	0
VGO	PRESSURE RELIEF DEVICE	0	0
VGO	PUMP	2	2
VGO	VALVE	0	0
		2	5
	TOTAL:	4	23